

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

ROBERT EDGAR, Individually and On	§	
Behalf of All Others Similarly Situated,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 4:17-CV-1372
	§	
ANADARKO PETROLEUM	§	
CORPORATION, R. A. WALKER, and	§	
ROBERT G. GWIN,	§	
	§	
Defendants.	§	

**STIPULATION AND AGREEMENT TO EXTEND THE COURT’S ORDER**

WHEREAS, in May 2017, this action was filed against Anadarko Petroleum Corporation and certain of its officers (“Defendants”);

WHEREAS, in November 2017, Lead Plaintiff filed its [Corrected] Amended Class Action Complaint for Violation of the Securities Laws (the “Amended Complaint”), which relied on facts disclosed by certain former Anadarko employees and a contractor (the “Unnamed Witnesses”);

WHEREAS, at a hearing on December 18, 2017, the Court ordered Lead Plaintiff to disclose to Defendants the names of the Unnamed Witnesses without attorneys’ eyes only restriction provided that (i) if any Unnamed Witness requests a job reference or similar recommendation from Anadarko, information about the Unnamed Witness’s role in this lawsuit must be kept from the person at Anadarko receiving the request and the person who receives the reference or recommendation; (ii) information about Unnamed Witness’s role in the lawsuit must be kept from those at Anadarko who receive and act on applications for employment with

Anadarko or who receive and act on requests for business from Anadarko, such as a potential contractor or vendor;

WHEREAS, on August 3, 2018, Lead Plaintiff filed its Second Amended Class Action Complaint for Violation of the Securities Laws (the “Second Amended Complaint”), which also relies upon allegations by additional unnamed former Anadarko employees and contractors (the “New Unnamed Witnesses”);

WHEREAS, Defendants requested the names of the New Unnamed Witnesses referenced in the Second Amended Complaint;

WHEREAS, counsel for Lead Plaintiff requested that disclosure of the names of the New Unnamed Witnesses referenced in the Second Amended Complaint should be subject to the same conditions as the Court imposed on disclosure of the Unnamed Witnesses in the Amended Complaint;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Lead Plaintiff and Defendants, through their undersigned attorneys, that:

1. Lead Plaintiff shall provide to Defendants the names of the New Unnamed Witnesses within 48 hours of the signing of this Order.
2. If any New Unnamed Witness requests a job reference or similar recommendation from Anadarko, then information about the New Unnamed Witness’s role in this lawsuit must be kept from the person at Anadarko receiving the request and the person who receives the reference or recommendation;
3. Information about the New Unnamed Witness’s role in the lawsuit must be kept from those at Anadarko who receive and act on applications for employment with Anadarko or who receive and act on requests for business from Anadarko, such as a potential contractor or vendor.

**IT IS SO ORDERED:**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Lee H. Rosenthal  
Chief United States District Judge

**STIPULATED TO AND APPROVED BY:**

September 20, 2018

**THE ROSEN LAW FIRM, P.A.**

/s/ Laurence M. Rosen

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